18 JUL 1974

Mr. Seymour Gettman
Chief, Pay and Leave Administration
  Section
Pay Policy Division
Bureau of Policies and Standards
U. S. Civil Service Commission
Washington, D. C. 20415

Dear Mr. Gettman:

As you requested, we have reviewed your draft of proposed additional instructions for implementing the Fair Labor Standards Act.

With regard to the initial notification of employees and the procedures for designation of status and establishment of reporting requirements, we believe that the requirement for including the designation on the Standard Form 50 through use of an identifier within the position number will be impracticable in our case. We plan, therefore, to provide some other form of notice, such as a special card which we will issue regularly as changes occur or a statement included on the Earnings Statement which is issued every two weeks.

We have studied the proposed instructions concerning the use of compensatory time and strongly recommend that there be no provision for use of compensatory time by non-exempt personnel in light of the conditions for such use which are set forth in the proposed instructions. Administration of the proposed policy would be most difficult, to the point of being impractical.

We are extremely concerned over the draft proposal on fractional reporting, both for overtime and leave. To comply with such a requirement will require a massive computer reprogramming at great expense of manpower and money. We urge, therefore, that employee entitlements to fractional hours of overtime be accommodated by reporting accumulation of quarterly hour increase in whole hours. Not only will this comply with the spirit of the FLSA, but there will be a considerable dollar savings.

In other respects, the proposed FPM Letter poses no problems for us and we find it acceptable.

Sincerely,

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Acting Director of Personnel

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